

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION**

IN RE: : **Case No. 23-50236**
BOYD EUGENE HOWDYSHELL II :
Debtor(s). : **Chapter 13**
: **Judge Rebecca B. Connelly**
:

SECOND MOTION TO EXTEND TIME TO FILE SCHEDULES AND PLAN

Debtor(s), by counsel, moves the Court for an order extending the time within which Debtor(s) may file schedules, and states that:

1. Debtor(s) filed a petition for relief under Chapter 13 of the Bankruptcy Code on May 15, 2023.
2. The petition for relief was filed as an emergency measure to stop creditor action after having postponed filing bankruptcy while exploring other options.
3. Debtor(s) previously sought an extension of time to file the schedules and plan, and was granted an extension until June 9, 2023.
4. Debtor(s) has used his best efforts to comply with the requirements to produce and file all schedules and Chapter 13 Plan within the time required by the Rules of Court but has been unable to do so.
5. The Meeting of Creditors is scheduled for June 13, 2023 at 2:30 PM, however the Chapter 13 Trustee has agreed to continue the hearing to June 27, 2023.
6. Debtor estimates needing an additional **eleven days**, until June 20, 2023, to complete and file the schedules and plan.

Respectfully Submitted,
BOYD EUGENE HOWDYSHELL II

By: /s/ Hannah W. Hutman
Counsel

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on June 8, 2023, a true and correct copy of the foregoing was served by ECF to the Chapter 13 Trustee and to all parties who have requested notice, including, and by first-class mail as follows:

Boyd Howdyshell
2493 Lee Jackson Hwy
Staunton, VA 24401
Debtor

By: /s/ Hannah W. Hutman
Counsel